

Exhibit A



Robert E. Bailey
Head of Litigation
Santander US
45 East 53rd Street
New York, NY 10022

May 30, 2019

Thomas R. Price, Esq.
Borrelli & Associates P.L.L.C.
655 Third Avenue, Suite 1821
New York, New York 10017

Re: William Nolan

Dear Mr. Price:

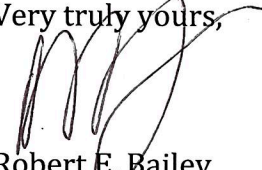
I write in response to your May 24, 2019 letter to Michael Lipsitz, Chief Legal Officer of Santander US, concerning the February 2019 closure of accounts maintained by William Nolan at Santander Bank, N.A. ("SBNA").

Please be advised that the account closures were an independent decision by SBNA. As you note in your letter, SBNA may close accounts for any reason at any time and is not required to provide any further explanation.

I note that your client was the subject of a December 29, 2018 *New York Post* article entitled "Ex-detective with 's—t list' caught with weapons stockpile in home," detailing his arrest for weapons possession and resisting arrest. Our highest priority is to maintain a safe and secure environment for all of our customers and employees. Moreover, as a regulated financial institution, SNBA has an obligation to know its customers and assess reputational risk.

I further understand that Mr. Nolan and his attorney were present at an SBNA branch on February 21, 2019 demanding an explanation for the account closures, began videotaping inside the branch without consent and subsequently were asked to leave.

Very truly yours,



Robert E. Bailey
Head of Litigation
Santander US

cc: Michael Lipsitz, Esq.